

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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NATIONAL IMMIGRATION PROJECT OF)
THE NATIONAL LAWYERS GUILD,) 11 Civ. 3235 (JSR)
AMERICAN CIVIL LIBERTIES UNION)
FOUNDATION, IMMIGRANT DEFENSE)
PROJECT, POST-DEPORTATION HUMAN) NOTICE OF MOTION
RIGHTS PROJECT, RACHEL)
ROSENBLUM,)
	Plaintiffs,)
)
	v.)
)
UNITED STATES DEPARTMENT OF)
HOMELAND SECURITY, UNITED)
STATES CITIZENSHIP AND)
IMMIGRATION SERVICES, UNITED)
STATES CUSTOMS AND BORDER)
PROTECTION, UNITED STATES)
IMMIGRATION AND CUSTOMS)
ENFORCEMENT, UNITED STATES)
DEPARTMENT OF JUSTICE, UNITED)
STATES DEPARTMENT OF STATE,)
)
	Defendants.)
)
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PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the Statement Pursuant to Local Rule 56.1 and accompanying exhibits, Plaintiffs National Immigration Project of The National Lawyers Guild, American Civil Liberties Union Foundation, Immigrant Defense Project, Post-Deportation Human Rights Project, and Rachel Rosenbloom, will move this Court before the Honorable Jed S. Rakoff, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York, for an order granting partial summary judgment in favor of plaintiffs, pursuant to Federal Rule of Civil Procedure 56, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule approved by the Court, Defendants' opposition to the Plaintiffs' motion must be filed by July 30, 2014 and argument will be heard at 4:00 P.M. on September 3, 2014.

Dated: July 16, 2014
New York, New York

Respectfully submitted,

/s/ Nancy Morawetz
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